

IN THE DISTRICT COURT OF THE UNITED STATES
FOR THE DISTRICT OF SOUTH CAROLINA
SPARTANBURG DIVISION

Blockquarry Corp. f/k/a ISW Holdings, Inc.,

Plaintiff,

v.

Litchain Corp. and Gaffney Board of Public
Works,

Defendants.

Gaffney Board of Public Works,

Counter-/Cross-Claimant,

v.

Blockquarry Corp. f/k/a ISW Holdings, Inc.,
Counterclaim Defendant, and Litchain Corp.,

Crossclaim-Defendant.

C/A No.: 7:23-cv-01427-TMC

JOINT STATUS REPORT

(Compliance with ECF No. 71)

Plaintiff and Crossclaim-Defendant Blockquarry Corp. f/k/a ISW Holdings, Inc. (“Blockquarry”) and Defendant and Counter-/Cross-Claimant Gaffney Board of Public Works (“Gaffney BPW”) file this joint status report to comply with the Court’s text order staying the proceeding. (ECF No. 71.) Blockquarry and Gaffney BPW are pleased to report the Court’s stay was effective for resolving Blockquarry and Gaffney BPW’s respective claims against each other.

1. On October 17, 2023, Blockquarry and Gaffney BPW filed a joint motion to stay to stay proceedings pending settlement discussions. (ECF No. 69, “Joint Motion to Stay”.) The Joint Motion to Stay requested the Court stay consideration of pending motions, including (i) Blockquarry’s motion for injunctive relief (ECF No. 7), (ii) Gaffney BPW’s motion to deposit

(ECF No. 42), and (iii) Blockquarry’s motion for partial default judgment against Defendant and Crossclaim-Defendant Litchain Corp. (“Litchain”) (ECF No. 63, “Blockquarry’s Default Motion”), and it also requested the Court stay Blockquarry’s reply brief to Blockquarry’s Default Motion.¹

2. This Court granted the Joint Motion to Stay by a text order issued on October 19, 2023. (ECF No. 71.) The order further required Blockquarry and Gaffney BPW to file a joint status report advising the Court of the result of settlement discussions not later than November 17, 2023. (*Id.*)

3. The posture of the case changed considerably during the pendency of the stay.

- On November 2, 2023, Blockquarry and Gaffney BPW filed a joint stipulation of dismissal with prejudice of their respective claims against each other. (ECF No. 73.) The joint stipulation of dismissal represented it did *not* dismiss Blockquarry and Gaffney BPW’s respective claims against Litchain. (*Id.*)
- On November 09, 2023, Gaffney BPW filed a request for default against Litchain (ECF No. 75), and the Clerk issued the same on November 13, 2023 (ECF No. 76).
- On November 16, 2023, Blockquarry and Gaffney BPW filed a joint notice of withdrawing motions, withdrawing: Blockquarry’s emergency motion for temporary restraining order and preliminary injunction (ECF No. 7) and Gaffney BPW’s motion for leave to deposit (ECF No. 42). (ECF No. 77.)

4. Given the posture discussed above, the only remaining motion pending before the Court is Blockquarry’s Default Motion, and the only remaining affirmative relief in the case is the

¹ Only Gaffney BPW opposed Blockquarry’s Default Motion. The Clerk of Court entered a default against Litchain on all claims. (*See* ECF No. 59 and 76.)

respective claims of Blockquarry and Gaffney BPW for declaratory relief and damages against Litchain.

5. Contemporaneously with the instant filing (or shortly thereafter), Blockquarry will deliver to the Court a proposed *consent* order resolving Blockquarry's Default Motion. Should the Court require (or desire) a reply brief to Blockquarry's Default Motion, Blockquarry requests the Court set a deadline for the same. The identified proposed *consent* order, however, resolves Blockquarry's Default Motion to the satisfaction of the only non-defaulted parties in the case.

Respectfully submitted on November 17, 2023,

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